

RE: HELENA V BATHER

) Case No. 18 B 07006
)
Debtor) Chapter 13
)
) Judge: DONALD R CASSLING

NOTICE OF MOTION

HELENA V BATHER

CUTLER & ASSOC

via Clerk's ECF noticing procedures

1231 N TAYLOR AVE
OAK PARK, IL 60302

Please take notice that on October 08, 2020 at 9:15 am., I will appear before the Honorable Judge DONALD R CASSLING or any judge sitting in the judge's place, present the motion set forth below.

This motion will be presented and heard telephonically. No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must set up and use an account with Court Solutions, LLC. You can set up an account at www.Court-Solutions.com or by calling Court Solutions at (917) 746-7476.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on September 08, 2020.

/s/ Tom Vaughn

**TRUSTEE'S MOTION TO DISMISS FOR FAILURE TO TURNOVER
TAX RETURN TO TRUSTEE**

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On March 12, 2018 the Debtor filed a petition and/or plan under Chapter 13 of Title 11 U.S.C.
2. The debtor's plan confirmed on May 03, 2018, provided for tax returns to be turned over to the trustee each year.
3. The trustee has not received the tax return or transcript for 2019.

WHEREFORE, the Trustee prays that this case be dismissed for material default by the debtor with respect to a term of a confirmed plan, pursuant to § 1307 (c) (6).

Respectfully submitted,

TOM VAUGHN
CHAPTER 13 TRUSTEE
55 E. Monroe Street, Suite 3850
Chicago, IL 60603
(312) 294-5900

/s/ Tom Vaughn